- the location of storm, sewer, sanitary, process sewerage systems and fire control systems;

- the location of operational units within the hazardous waste management facility site, including equipment clean-up areas, where hazardous waste will be stored. The location of the pencilled-in storage must be as built certified by a professional engineer; and

- land that is within 1000 feet of the storage area and not on Pratt & Whitney property must have its uses indicated.

→ More than one map may be used if needed for clarity.

3. Floodplain Standard (§122.25(a)(11) and 264.18(a)).

Page A-58 is not legible and must be resubmitted. The calculations, maps and data used to determine whether or not the facility is in the 100-year floodplain must be submitted. If the facility is in the 100-year floodplain, a demonstration that satisfies §122.25(a)(11)(iv) must be made.

III. WASTE CHARACTERISTICS

1. Chemical and Physical Characteristics (§122.25(a)(2) and 264.13).

The permit application must provide a description of all hazardous wastes that will be stored. There must be a detailed physical and chemical analysis of a representative sample of each waste that details hazardous characteristics and constituents. Please note that not all wastes that are stored (e.g. nickel strike solution) or are being proposed for storage have had this information supplied.

Not all hazardous wastes have been listed with their correct EPA Hazardous Waste Identification Number (e.g., if methyl ethyl ketone is used for a solvent, when it becomes spent it should be designated as a F005 waste and not U159). This deficiency must be corrected on both the permit application and Part A.

It is not sufficient to merely list waste characteristics (e.g. flash point for the waste paint/solvent mixture on page A-3). Documentation (and an analysis) of the waste must be provided.

2. Waste Analysis Plan (§122.25(a)(3) and 264.13(b)).

The permit application does not meet the above requirements. The following additional information must also be included:

- a list of the parameters chosen for analysis for each waste;

- an explanation of why these parameters were chosen;

- a description of the frequency in which the analyses will be done and an explanation for the chosen frequency;

- o a list of the sampling method used to obtain a representative sample from each waste to be analyzed; and

- o the methods that will be used to meet the additional analytical requirements for handling and storing ignitable and reactive wastes specified in 264.17.

Pages A-7, -8, -12, -20, -21, -22, -23 and -25 must state what methods were used for the analyses.

Pages A-20, -21 and -27 must state what wastes were analyzed to yield the results shown.

IV. PROCESS INFORMATION

1. Containers (§122.25(b)(1),,264.171 and 264.172).

The permit application must supply evidence of the compatibility of wastes with the storage containers used at the facility.

2. Container Management Practices (§122.25(a)(1), 122.25(a)(8), 122.25(b)(1), 264.172, 264.173 and 264.175).

The permit application must contain additional information about container management practices relating to waste collection and storage. This must include the following:

- o procedures used to ensure that ignitable wastes do not ignite whenever they are handled or when they are being stored in the storage area in full sunlight;

- o procedures used to ensure that incompatible wastes are not mixed, especially when half full barrels are returned to the generation point for filling (precautions during such transport must also be described);

- o procedures to ensure that hazardous waste containers are always kept closed except when adding or removing wastes and that they are stored, transported, opened, and handled in a manner that they do not rupture or leak;

- o procedures used to arrange and provide for aisle space for the maximum planned waste inventory must be shown on a figure drawn to scale; and

- o documentation that the sludge filter cake containers meet U.S. Department of Transportation requirements.

3. Containment System (§122.25(b)(1), 264.175(b) and 264.177(c))

The permit application must provide the following additional information:

- o documentation that the sump collection basin and the base of the storage area are sufficiently impervious to contain

leaks, spills and precipitation until these materials are collected and removed; and

- o procedures to ensure that incompatible wastes are separated from other materials or are protected from them by a berm or other such device in the storage facility.

4. Containment System Capacity (§122.25(b)(1) and 264.175(b)(3)).

The permit application must provide more detailed information of the design of the containment sump basin. The following must be provided:

- o specifications on the capacity of the sump above the outlet pipe. Is the capacity remaining sufficient to meet the regulatory requirements; and
- o clarify whether the 1,285 gallon capacity on page C-2 or the 6,235 gallon capacity figure on page E-3 is the correct containment capacity. All calculations must be shown (and must include possible spills from the acid/alkali transporters).

5. Removal of Liquids From the Containment System (§122.25(b)(1) and 264.175(b)(5)).

The permit application must include the following additional information:

- o methods, parameters and justification for parameter selection used to determine whether liquids in the sump basin are hazardous wastes;
- o methods that will be used to manage the liquids (including documentation of pump compatability) if they are found to be hazardous;
- o documentation that any discharge through the Post Indicator Valve (PIV) is permitted under NPDES (National Pollutant Discharge Elimination System); and
- o methods to keep records of analyses.

V. PROCEDURES TO PREVENT HAZARDS

1. General Inspection Schedule (§122.25(a)(5), 264.15, 264.33 and 264.174).

The submitted Inspection Schedule does not contain a sufficient level of detail. The permit application must include schedules for inspecting all areas. In addition, a schedule for inspecting safety equipment, emergency equipment, security devices, operation and structural equipment and equipment specified in §264.33 must be included. The schedules must specify the types of problems that are to be looked for and the frequency of inspection. Provisions for recording the time of inspections and nature of any repairs must also be included on the schedule.

In addition, the application must:

- o include a daily inspection schedule for all areas subject to hazardous waste spills, such as waste loading and unloading areas, whenever they are in use;
- o clarify the reference on page A-35 to pumping "liquid to DWW wet well;"
- o reference procedures that will be followed if the sludge storage containers are leaking, corroding, etc.; and
- o include provisions to ensure that when the sump basin is inspected and found to contain liquids, the liquids will be promptly tested and removed.

2. Preventive Procedures, Structures and Equipment (§122.25(a)(8)).

The permit application must provide additional information regarding the following:

- o procedures beginning at the point of generation, used to prevent hazards in the loading and unloading of hazardous waste;
- o procedures that prevent contamination of water supplies during on-site movement of hazardous waste;
- o procedures that mitigate the effects of equipment failure and power failure at the storage area and point of generation; and
- o procedures to prevent undue exposure of personnel to hazardous waste.

Page A-40 is not legible and must be resubmitted.

3. Prevention of Ignition and Reaction of Ignitable and Incompatible Wastes (§122.25(a)(9) and 264.17(a) and (b)).

The permit application must provide the following additional information:

- o waste solvents and acids (sometimes stored in storage facility) can be incompatible. What procedures are used to ensure that these and other incompatible wastes are properly managed?
- o list each ignitable waste that is stored at the facility and document that sparks, radiant heat, etc. will not cause ignition. Document that handling procedures, from the point of generation, will not cause ignition.
- o document that handling procedures, from the point of generation, will not cause ignition or reaction.

4. Management of Incompatible Wastes in Containers (§125.25(b)(1) and 264.177)).

See Comments and IV.3 and V.3.

VI. CONTINGENCY PLAN

1. General Information (§122.25(a)(7) and 264.50-56).

The contingency plan must be a self-contained document which describes completely all the information required under the regulations and is able to stand as a separate document. The plan as contained in the application fails to do this. The plan must also include a general facility description detailing hazardous waste management areas and facility operations.

2. Emergency Coordinator (§264.52(d) and 264.55)

The contingency plan must include a statement authorizing the emergency coordinator to commit all necessary resources and a list of the coordinators' qualifications for the position.

3. Emergency Response Procedures (§122.25(a)(7), 264.52(a) and 264.56).

The contingency plan must include:

- o procedures that will be used to identify the hazardous wastes involved in the emergency;
- o procedures that will be used to assess the possible hazards presented by the emergency;
- o specific control procedures to be taken in the event of a fire, explosion or release to the environment (including groundwater);
- o documentation of steps that will be taken to treat, store or dispose of any material that results from a fire, explosion or release must be provided. Not all hazardous waste (e.g. waste water treatment sludge) are provided for in the Spill Response Section (page B-33).

4. Emergency Equipment (§264.52(e)).

The contingency plan must include the description, location and capabilities of all emergency equipment, including respirators and protective clothing. Equipment locations must be provided on a site plan.

5. Coordination Arrangements (§264.52(c) and 264.37).

A description of coordination arrangements that have been reached with local authorities must be included. A description of what will be done is not sufficient. Documentation of refusals to enter a coordination arrangements is also acceptable (if applicable).

6. Evacuation Plan (§264.52(f)).

The diagrams of the evacuation plan are not legible and must be resubmitted.

7. Amendment of Contingency Plan (§264.54).

The contingency plan must also be amended whenever the permit is revised.

VII. PERSONNEL TRAINING

1. Job Titles and Duties (§264.16(d) and 122.25(a)(12).

The name, job title, duties and job description of all employees + fire brigade whose position is related to hazardous waste management at the facility (e.g. this includes fork lift operators) must be given.

2. Training Content, Frequency and Techniques (§264.16(c) and (d)(3)).

A description of the training content, frequency and techniques must be provided for each employee involved in hazardous waste management.

3. Relevance of Training to Job Description (§264.16(a)(1)).

The permit application must document that the training received is relevant to the position held by the employee.

4. Training for Emergency Response (§264.16(a)(3)).

The permit application must contain a demonstration that the training is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- o procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipments;
- o key parameters for automatic waste feed cut-off systems;
- o communications or alarm systems;
- o response to fires or explosions;
- o response to ground-water contamination incidents; and
- o shutdown of operations.

5. Implementation of Training Program (§264.16(b) and (d)(4)).

The permit application must document that new or transferred employees will successfully complete the appropriate training within 6 months and will not work without supervision until they do.

VIII. CLOSURE PLAN

1. Description of Closure Activities (§122.25(a)(13 and 264.112(a)(11)).

The plan must identify all steps necessary to close the facility.

- check list must be a complete plan

2. Maximum Inventory (§122.25(a)(13) and 264.112(a)(2)).

The permit application must clarify the reference to the volume of the sump basin on pages C-2 and E-3. The figures appear to be different.

3. Decontamination Procedures (§122.25(a)(13) and 264.114).

The procedures used to close facility equipment must be included. The workers who will do this must be specified and their costs for this activity must be included in the closure cost estimate. The testing program used to determine if decontamination of equipment is effective must be described and its cost included in the closure cost estimate.

4. Closure of Containers (§264.178).

The closure plan must include plans to either remove or decontaminate the waste-containment facility base and soils (if necessary). The cost to do this must be included in the closure cost estimate. The testing program used to demonstrate the need for removal must also be included. The cost of testing and disposing of rinsewater must be included. Methods of testing rinsewaters and parameters to be tested must be described. ✗ CDSTS

The maximum waste inventory and schedule of closure must be revised to reflect the above considerations.

5. Closure Plan Amendment (§264.112(b)).

The Closure plan must be amended as specified in §264.112 (b).

6. Closure Cost Estimate (§122.25(a)(15) and 264.142).

The closure cost estimate must include:

- all costs associated with liner testing removal, etc. mentioned previously; unless reasonable
- must be revised as stated in §264.142(b) and 264.142(c); and
- must be kept at the facility as in §264.142.

The cost estimates for filter cake disposal on page C-3 are not consistent being given as either $100.00 or $1,000.00 per container and must be corrected.

7. Financial Test (§122.25(a)(15), 264.143(f) and 264.147).

The permit application must clarify the Moody's Bond rating of Aa3 given on page D-5. Is this equivalent to one of those given in §264.143(f)(1)(ii) (A)?

Closure cost estimates must be revised to reflect any changes in closure plan cost at the facility.

Under §264.143(f)(3)(iii)(B), the independent certified public accountant's letter must state "no matters came to his attention which caused him to believe that the specified data should be adjusted."

Under §264.143(f)(5), the items submitted under (f)(3) must be updated every fiscal year within 90 days of the close of the fiscal year.

8. Liability Requirements (§264.147).

The insurance policy must be amended by the attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in §264.151(i). The wording of the certificate of insurance must be identical to the wording specified in §264.151(j).

IX. OTHER PERMITS

COMPLIANCE WITH OTHER FEDERAL LAWS (§122.25(a)(20), §122.12)

Certification that the facility is in compliance with the following Federal Laws must be submitted: The Wild and Scenic Rivers Act, The National Historic Preservation Act of 1966, The Endangered Species Act, The Coastal Zone Management Act and The Fish and Wildlife Coordination Act.